

1 John A. Dalimonte
(Admitted Pro Hac Vice, MA Bar No. 554554)
2 **DALIMONTE RUEB, LLP**
85 Devonshire Street, Suite 1000
3 Boston, MA 02109
Telephone: (833) 443-7529
4 Facsimile: (855) 205-2053
5 john@drlawllp.com

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE DISTRICT OF ARIZONA

9 IN RE BARD IVC FILTERS PRODUCTS
LIABILITY LITIGATION

No. 2:15-MD-02641-PHX-DGC

10 This Document Applies to:

11 **WILLIAM CONRAD**
12

**SECOND AMENDED MASTER
SHORT FORM COMPLAINT FOR
DAMAGES FOR INDIVIDUAL
CLAIMS AND DEMAND FOR JURY
TRIAL**

13
14 Plaintiff(s) named below, for their Complaint against Defendants named below,
15 incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).
16 Plaintiff(s) further show the Court as follows:

17 1. Plaintiff/Deceased Party:

18 William Conrad

19 2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
20 consortium claim:

21 None

22 3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

23 None

24 4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the
25 time of implant:

26 OR
27
28

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at the time of injury:

OR

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

OR

7. District Court and Division in which venue would be proper absent direct filing:

United States District Court for Oregon

8. Defendants (Check Defendants against whom Complaint is made):

☒ C.R. Bard Inc.

☒ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

☒ Diversity of Citizenship

☐ Other:

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

☐ Recovery[®] Vena Cava Filter

 [®]
G2 Vena Cava Filter

 [®]
G2 Express

☐ [®]
G2 X Vena Cava Filter

☐ Eclipse[®] Vena Cava Filter

Meridian[®] Vena Cava Filter

☐ Denali[®] Vena Cava Filter

11. Date of Implantation as to each product:

12. Counts in the Master Complaint brought by Plaintiff(s):

- 3-

1 state the facts supporting this Count in the space
2 immediately below)

3
4
5
6 13. Jury Trial demanded for all issues so triable?

7 ☒ Yes

8 ☐ No

9 RESPECTFULLY SUBMITTED this 27th day of February, 2019.

10
11 By: /s/ John A. Dalimonte

12 John A. Dalimonte
13 (Admitted Pro Hac Vice, MA Bar No. 554554)
14 **DALIMONTE RUEB, LLP**
15 85 Devonshire Street, Suite 1000
16 Boston, MA 02109
17 Telephone: (833) 443-7529
18 Facsimile: (855) 203-2035
19 john@drlawllp.com

20 I hereby certify that on this 27th day of February, 2019 I electronically transmitted
21 the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal
22 of a Notice of Electronic Filing.

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24
25
26
27
28 /s/ John A. Dalimonte